



**DEPARTMENT OF THE AIR FORCE**  
**HEADQUARTERS 129TH RESCUE WING (ACC)**  
**MOFFETT AIR NATIONAL GUARD BASE CALIFORNIA**



11 Oct 2017

TO: Ms. Julianne Polanco, State Historic Preservation Officer, Office of Historic Preservation  
Department of Parks & Recreation, 1725 23rd Street, Suite 100. Sacramento, CA 95816

FROM: 129 Rescue Wing, Moffett Air National Guard Base, California

SUBJECT: Ongoing Section 106 Consultation for California Air National Guard Facilities Relocation  
and Improvements at 129th Rescue Wing Cantonment Area, Moffett Air National Guard Base  
(ANGB), Moffett Federal Airfield, Santa Clara County, California (USAF\_2017\_0830\_001)

ATTN: Ed Carroll

1. In response to your letter dated September 19, 2017, regarding Section 106 review of the California Air National Guard (CAANG)'s finding of effect for new facilities at its 111-acre cantonment area located at Moffett Federal Airfield (MFA), Santa Clara County, CA ANG would like to provide additional information for consultation. Please note the responses below the comments received (*ital.*).

*1) Pursuant to 36 CFR Part 800.4(a)(1), the APE, defined as the entirety of the NAS Sunnyvale Historic District, appears sufficient to take the undertaking's effects on historic properties into account.*

CA ANG acknowledges SHPO's concurrence on the APE, noting that the APE for archaeological resources is limited to the project footprints included in the undertaking.

*2) The SHPO concurs with the determination that Buildings 654, 655, 656, 657, 658, 659, 660, 661 and 669 do not meet NRHP eligibility requirements.*

CA ANG acknowledges SHPO's concurrence.

*3) CA ANG's documentation explains that "the new construction will have a design aesthetic and material palette that is related to existing aviation-related buildings surrounding the airfield, and will be of an appropriate scale that does not detract for the visual dominance of Hangars 1, 2 and 3." (Page and Turnbull: 2017). The analysis of Rehabilitation Standard 9 provided by CA ANG is a useful narrative however the SHPO requests photographs of the buildings referenced as "surrounding the airfield" and representative renderings of proposed new construction accompanied by a comparative analysis of current and proposed materials and scale to supplement the analysis.*

Supplemental Analysis under Rehabilitation Standard 9:

The existing buildings located at CA ANG are typically one to three stories in height with overall footprints that vary from large hangars to smaller support buildings. Other buildings located around the airfield and throughout MFA are similar, except for the monumental Hangars, which are the largest and most defining structures. The buildings proposed to be constructed as part of the undertaking are similar. Heights will typically range from one to three stories and none will exceed the height of the existing hangar (Building 662) and Building 663, the tallest buildings presently at the cantonment area. In terms of footprint, the proposed buildings will be larger than many of the smaller support buildings at CA ANG and MFA, but consistent with the mid-size and larger buildings found throughout. All proposed buildings will be significantly smaller in scale compared to the monumental structures of Hangars 2 and 3, located north of the project site. As such, the scale of the proposed buildings will be consistent with the established characteristics of the airfield. Renderings of proposed buildings are included in Attachment A.

The existing buildings at CA ANG have an industrial material palette, namely concrete, metal framed divided lite windows, and metal panels implemented as siding and roofing throughout. This is comparable to other buildings in the broader MFA area, which also features raw brick and concrete masonry, metal and concrete panels, and other industrial materials. Typically, the proposed buildings associated with the undertaking will feature similar materials to the existing buildings described above. Materials will include concrete masonry unit blocks, prefinished metal panels, divided-lite aluminum windows, metal roll-up doors, and pre-cast concrete panels. These materials will clearly be compatible with the established industrial vocabulary at MFA. Other materials, such as the translucent panels being utilized at some locations, are less common throughout MFA, but can still be found at select locations, such as the corrugated skylight panels that are present at both Hangars 2 and 3. The use of metal panels at the proposed buildings will also integrate the undertaking with the surrounding CA ANG structures, which consistently feature blue metal panels throughout the site as a cohesive design feature. Although the materials being utilized at the proposed buildings of the undertaking will be compatible with the surrounding buildings throughout MFA and CA ANG, the materials will still differentiate the proposed buildings from any historic properties through their contemporary qualities and application in the overall designs.

The following photos (Figures 1-6) show views of the project area.



Figure 1. View facing northeast; Building 679 from south end of the project area.



Figure 2. View facing south; Building 681 in background, Enterprise Way at far left.





Figure 3. View facing west towards runways; Hangar 1 in background.



Figure 4. View facing northwest; Building 662 (blue roof) and Hangar 2 in background.





Figure 5. View facing north; Buildings 662 and 650 in background, Enterprise Way at right.



Figure 6. View facing northeast; Hewlett-Packard buildings on opposite side of Enterprise Way.

*4) The SHPO requests documentation confirming CA ANG's public and Native American notification and consultation efforts.*

Recent efforts to consult with the Native American Heritage Commission (NAHC) regarding Ames Research Center (ARC), including CA ANG cantonment area, have resulted in negative Sacred Lands File searches. As part of a comprehensive study of archaeological resources at ARC (AECOM 2017a), the NAHC was contacted on 21 April 2016, requesting a search of their Sacred Lands File and a list of Native American tribes and representatives with a known interest in the area. A response from the NAHC was received 27 April 2016, indicating that the Sacred Lands File search was negative for cultural resources. Five Native American representatives were identified by the NAHC, but none of the tribes represented are federally recognized tribes as defined in the NHPA (54 U.S.C. § 300309) and as identified by the U.S. Department of the Interior's Bureau of Indian Affairs and listed in 81 Federal Register 5019, published 29 January 2016. Additional outreach to non-federally recognized tribes regarding cultural resources management at ARC, including the CA ANG cantonment area, dated 13 April 2017 received no response. SHPO concurred with the findings of the Archaeological Resources Study as a baseline study for future archaeological study at ARC in a letter dated 22 June 2017 (NASA\_2015\_0928\_001). Documentation related to Native American consultation efforts at ARC is included in Attachment B.

To provide information to the public, CA ANG has posted its Section 106 documentation on NASA's historic preservation office's website at <https://historicproperties.arc.nasa.gov/section106.html>.

CA ANG finds these efforts to inform potential participants in the Section 106 process to be adequate in fulfilling its responsibilities.

*5) The AECOM archaeological report states "the undertaking is not anticipated to have any adverse effects on historic properties, with the exception of the potential to affect unknown subsurface archaeological resources (the likelihood of which is anticipated to be low, based on analysis presented in AECOM 2017a)." However, the report pertains only to the proposed backup south gate and vehicle maintenance facility areas but not the remainder of the project area. While identification efforts appear reasonable for the two aforementioned locations, the SHPO requests justification as to why the remainder of the project area was not subject to a similar level of effort, especially as CA-SCL-14 was recorded as being at the northwestern edge of the proposed areas of work. To that end, the SHPO requests analysis of how proposed ground disturbing activities in this area may impact information-bearing archaeological deposits associated with CA-SCL-14.*

AECOM and WSA performed archaeological surveys in different areas of the archaeological APE in response to the plans of two project proponents, Planetary Ventures, Inc. and CA ANG. No documented archaeological sites are located within the archaeological APE. Prehistoric archaeological site CA-SCL-14 is located immediately adjacent to, but outside of, the northwestern corner of the APE. A map of the APE specifically related to archaeological resources is provided in Attachment C.

No documented archaeological resources are located within the area analyzed by AECOM (see Figure 5, AECOM 2017b). AECOM surveyed areas of the APE that are in the vicinity of several documented sites outside of the APE to the east, and identified prehistoric isolates during the survey. Due to the proximity

of known sites, subsurface testing was performed near the isolates to identify potential subsurface sites. The subsurface testing did not identify archaeological resources, and AECOM did not recommend further monitoring of the area that was tested.

One previously recorded site location, CA-SCL-14, is located immediately outside the western boundary of the area analyzed by WSA (see Figure 5, WSA 2017). WSA conducted pedestrian survey in areas adjacent to the mapped location of CA-SCL-14 and identified no surface evidence of this site. As extensive pavement and building development in the area adjacent to CA-SCL-14 obscures much of the ground surface from the view of surveyors and active Air National Guard use poses logistical challenges to subsurface testing through paved surfaces, WSA recommended monitoring of archaeologically sensitive areas during ground disturbing activity.

*6) The SHPO requests additional information regarding CA ANG's approach to ensuring their compliance with CFR Part 800.13(b).*

As indicated under the Assessment of Effects in the letter to SHPO dated 25 August 2017, CA ANG will follow the standard operating procedure for unanticipated discoveries as outlined in the Draft Integrated Cultural Resources Management Plan (ICRMP) for ARC. Standard Operating Procedure #8 is included in Attachment D.

*7) The SHPO cannot concur with CA ANG's finding of no adverse effect to historic properties pursuant to 36 CFR Part 800.5 (d)(1) at this time but looks forward to receiving the information requested this letter in the interest of continuing this consultation.*

CA ANG, in applying the Criteria of Adverse Effect on the proposed undertaking, has determined that the undertaking's impact would result in No Adverse Effect due to its minimal impact on the ability of the NAS Sunnyvale Historic District to convey its historical associations that make it eligible for the NRHP. CA ANG has determined that a finding of No Adverse Effect is appropriate for this undertaking. CA ANG trusts that the additional information provided herein will satisfy the SHPO's request and provide ample response for the SHPO to concur with its finding of No Adverse Effect.

Please contact me at 650-417-1874 or at 650-603-9191 with your comments or questions.

ANDREW FERGUSON, Lt Col, CA ANG  
Commander, 129 Mission Support Group

**cc:**

NASA ARC/D/Ms. Ladwig  
NASA ARC/JCE/Mr. Venter  
NASA ARC/JCE/Mr. Ikan  
NASA HQ/LD/Dr. Klein  
CA ANG/Lt. Col. Ferguson  
CA ANG/Maj. Marulanda



### **Attachments**

- A. Renderings of Proposed New Construction within 129 RQW Cantonment Area
- B. Native American consultation documentation
- C. Map of APE – Archaeological Resources
- D. SOP #8 from ARC’s Draft ICRMP (2014)

### **References**

AECOM Technical Services, Inc. (AECOM)

2017a *Ames Research Center Archaeological Resources Study*. (Previously submitted to SHPO)

2017b *Archaeological Resources Identification and Evaluation Report for the California Air National Guard Vehicle Maintenance Facility and Backup Gate Project, Moffett Federal Airfield, Santa Clara County, California*. (Previously submitted to SHPO)

WSA

2017 *Cultural Resources Assessment Report California Air National Guard 129th Rescue Wing Relocation Project, Santa Clara County, California*. (Previously submitted to SHPO)

## Attachment A: Rendering of Proposed New Buildings



































## Attachment B: Native American Consultation Documentation

**From:** Redmond, Jennifer  
**To:** ["nahc@nahc.ca.gov"](mailto:nahc@nahc.ca.gov)  
**Subject:** NASA Ames Research Center  
**Date:** Thursday, April 21, 2016 1:07:00 PM  
**Attachments:** [NASA ARC Sacred-Lands-File-NA-Contact-Form.pdf](#)  
[ARC Boundary.pdf](#)

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Dear Ms. Pilas-Treadway,

NASA is conducting a desktop survey to identify cultural resources within the boundary of the NASA Ames Research Center (ARC) at Moffett Field. NASA ARC is located on the bayshore in Mountain View, Santa Clara County, within Township 6S, Range 2W, Sections 10 and 15 and unsectioned portions of the *Rancho Posolmi* and *Rancho Pastoria de las Borregas* land grants as depicted on the U.S. Geological Survey (USGS) 7.5-minute *Mountain View, Calif* topographic quadrangle (please see attached map).

I am requesting the following information:

- Groups or individuals the NAHC identifies as having a known interest in the geographical boundaries of NASA ARC
- Identification by the NAHC of any sacred lands with the boundaries of NASA ARC that are listed in the Sacred Lands File

Please notify me if your organization has any information related to cultural resources that may exist on and in proximity to NASA ARC. To reach me, please contact me at the address and phone number below, or via email. I look forward to hearing from you.

Thank you,  
Jenn

**Jennifer Redmond, RPA**  
Archaeologist  
D 510.874.3265  
[jennifer.redmond@aecom.com](mailto:jennifer.redmond@aecom.com)

**AECOM**  
1333 Broadway, Suite 800, Oakland, CA 94612-1924  
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[www.aecom.com](http://www.aecom.com)

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## NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
(916) 373-3710  
Fax (916) 373-5471



April 27, 2016

Jennifer Redmond  
AECOM

Sent by Email: Jennifer.redmond@aecom.com  
Number of Pages: 3

RE: NASA Ames Research Center, Mountain View, Santa Clara County

Dear Ms. Redmond:

A record search of the Native American Heritage Commission (NAHC) *Sacred Lands File* was completed for the area of potential project effect (APE) referenced above with negative results. Please note that the absence of specific site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE.

I suggest you contact all of those listed, if they cannot supply information, they might recommend others with specific knowledge. The list should provide a starting place to locate areas of potential adverse impact within the APE. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact via email: Sharaya.souza@nahc.ca.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharaya Souza".

Sharaya Souza  
Staff Services Analyst



Contact information for chairpersons of the following Native American groups was redacted to protect their privacy:

Amah Mutsun Tribal Band, Galt, CA  
Amah Mutsun Tribal Band of Mission San Juan Bautista, Woodside, CA  
Indian Canyon Mutsun Band of Costanoan, Hollister, CA  
Muwekma Ohlone Indian Tribe of the SF Bay Area, Milpitas, CA  
The Ohlone Indian Tribe, Fremont, CA



National Aeronautics and Space Administration



**Ames Research Center**  
Moffett Field, California 94035

April 13, 2017

Valentin Lopez, Chairperson  
Amah Mutsun Tribal Band  
P.O. Box 5272  
Galt, CA 95632

**Subject:** Notification of Draft Programmatic Agreement and Section 106 Consultation  
Opportunity as an Interested Party for Ames Research Center, Moffett Field,  
California

Dear Chairperson Lopez:

In support of its responsibilities under Section 106 of the National Historic Preservation Act (NHPA), the National Aeronautics and Space Administration (NASA) has proposed the establishment of a Programmatic Agreement among NASA, the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP) regarding the management of facilities, infrastructure, and sites at Ames Research Center (ARC) at Moffett Field, California. Please find below a brief summary of a recent archaeological resources investigation conducted for ARC and a link to the current Draft Programmatic Agreement. A map showing the location of ARC is provided as Attachment A.

***Archaeological Resources Investigations at ARC***

An Archaeological Resources Study consisting of a desktop survey of archival resources and geoarchaeological assessment was conducted in 2016. A Native American Heritage Commission (NAHC) Sacred Lands File Check dated April 27, 2016, was negative for sacred sites. The record search conducted at the Northwest Information Center indicated that eight archaeological resources were previously recorded within the study area (CA-SCL-14, 15, -16, -17, -18, -19, -20/H, -23). These prehistoric surface sites were originally recorded in 1912, have been investigated numerous times, and have not been relocated since the mid-1900s. The results of the literature review indicated that 51.16 percent (944 of 1845 acres) of ARC has been assessed for archaeological resources by previous investigations, with 49.19 percent of the ARC boundary surveyed (907.56 of 1845 acres) and 6.60 percent (121.88 of 1845 acres) included in subsurface testing programs. Furthermore, extensive subsurface testing (88 five-by-2 foot BTUs and 18 core samples) in the vicinity of CA-SCL-23 suggests that the area no longer contains any prehistoric



archaeological component, having been removed through both agricultural and early military development. In addition, a review of existing soils data and recent geotechnical studies conducted within and in the vicinity of the study area determined that surface soils in ARC are not conducive to human occupation and that the entire study area is generally considered to have a low geoarchaeological potential (i.e., a low potential for prehistoric archaeological resources buried through natural processes).

***Draft Programmatic Agreement***

Although no prehistoric, cultural, or traditional historic properties have been identified at ARC, and no Federally Recognized Tribes are associated with this location, the NAHC indicated that your organization may have knowledge of the potential for archaeological sites at ARC. We invite you to review the Draft Programmatic Agreement and participate in the process as an Interested Party. The Draft Programmatic Agreement is posted on the NASA Historic Preservation Office website provided below.

[https://historicproperties.arc.nasa.gov/downloads/section106\\_arc\\_draft\\_pa\\_20170310.pdf](https://historicproperties.arc.nasa.gov/downloads/section106_arc_draft_pa_20170310.pdf)

If you wish to participate as an Interested Party, please notify us in writing within 14 days from the receipt of this letter. Please contact me at [keith.venter@nasa.gov](mailto:keith.venter@nasa.gov) or at (650) 604-6408, if you have any questions or need additional information.

Sincerely,



Keith Venter  
Historic Preservation Officer



**Ames Research Center**  
Ames Research Center, MS 213-8  
Moffett Field, California 94035

**cc:**

HQ/EMD/Ms. Klein, Ph.D., RPA  
Valentin Lopez, Amah Mutsun Tribal Band  
Irenne Zwierlein, Amah Mutsun Tribal Band of Mission San Juan Bautista  
Ann Marie Sayers, Indian Canyon Mutsun Band of Costanoan  
Rosemary Cambra, Muwekma Ohlone Indian Tribe of the San Francisco Bay  
Andrew Galvan, The Ohlone Indian Tribe

**Attachment**

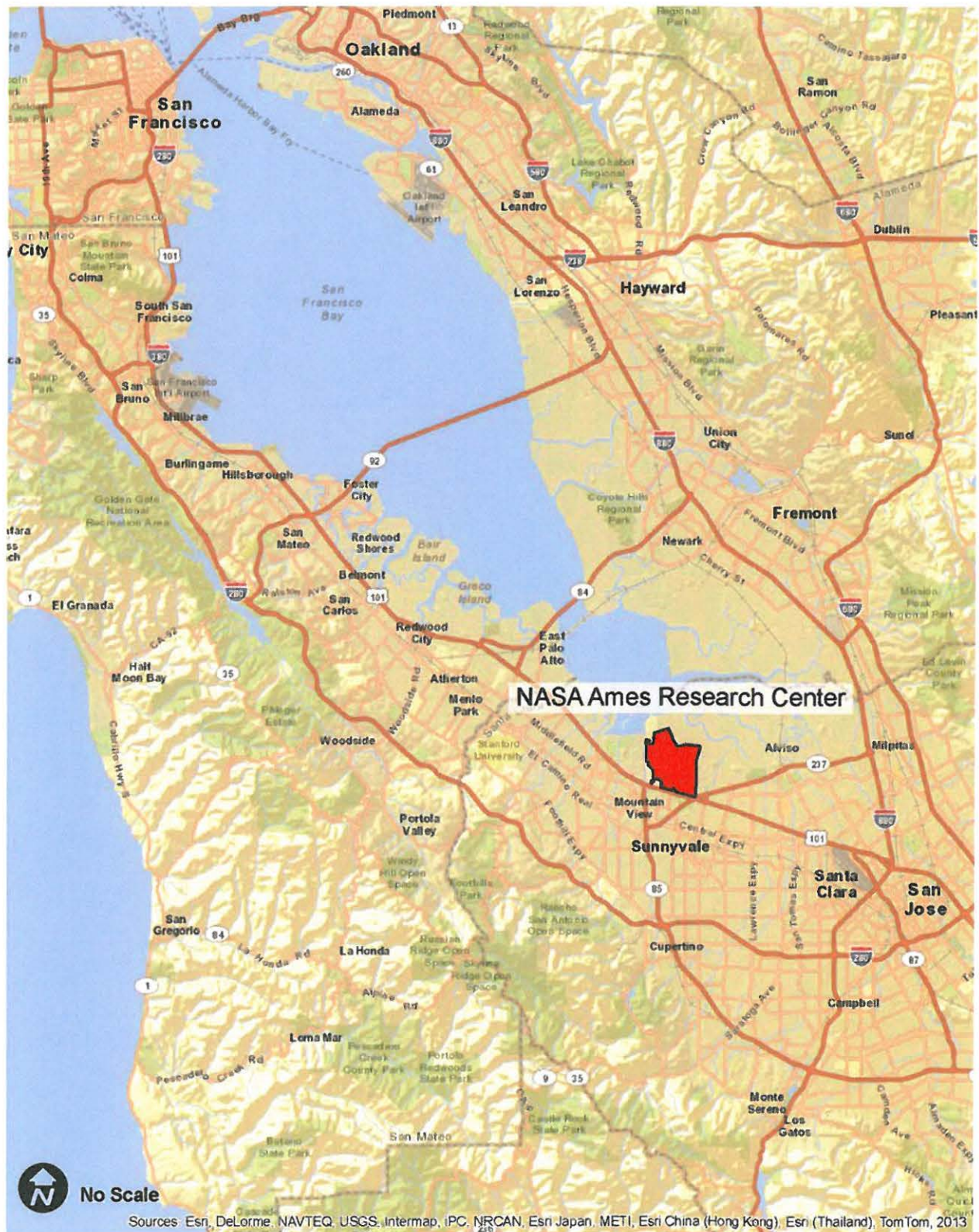
A. Map of ARC



# **ATTACHMENT A**

## **MAP**







**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



June 22, 2017

In reply, refer to: NASA\_2015\_0928\_001

Keith Venter  
Historic Preservation Officer  
Facilities Engineering Branch  
NASA Ames Research Center  
Mail Stop 213-8  
Moffett Field, CA 94035

Subject: Archaeological Resources Study of NASA Ames Research Center, Moffett  
Federal Airfield, Santa Clara County, California

Dear Mr. Venter:

Thank you for your February 24, 2017, letter and submittal of the Archaeological Resources Study for NASA Ames Research Center (ARC). NASA submitted the study to support the proposal to enter into a Programmatic Agreement to streamline the Section 106 process for undertakings unlikely to have adverse effects on historic properties. NASA intends for the study to serve as a baseline for future investigation and treatment of archaeological resources at ARC and as a reference for professionally qualified staff for future undertakings.

After reviewing the information submitted, the SHPO finds the conclusions in the study to be acceptable and sufficient for the proposed future uses.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Mark Beason, State Historian, at (916) 445-7047 or [mark.beason@parks.ca.gov](mailto:mark.beason@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julianne'.

Julianne Polanco  
State Historic Preservation Officer



Removed from public posting

Attachment C. Map of APE - Archaeological Resources



## Attachment D: SOP No. 8: Inadvertent Discovery of Archaeological Resources



### **6.1.8 SOP No. 8: Inadvertent Discovery of Archaeological Resources**

Regardless of whether an archaeological inventory has been completed and regardless of whether a planned undertaking has been assessed for its effect on known historic properties, every undertaking that disturbs the ground surface has the potential to discover buried and previously unknown archaeological deposits. NPR 8510.1 requires an SOP for responding to inadvertent discovery of archaeological resources. This SOP outlines the policies and procedures to be followed in such cases.

#### ***Applicable Laws/Regulations/Procedural Requirements***

- National Historic Preservation Act
- National Environmental Policy Act
- Archaeological and Historic Preservation Act
- Archaeological Resource Protection Act
- Native American Graves Protection and Repatriation Act
- NASA Procedural Requirements 8580.1 and 8510.1

#### ***Policy***

- The HPO in the Facilities Engineering Division is designated as the point of contact for the Section 106 process, including those projects proposed by organizations that are subject to the Section 106 process.
- EMD, as delegated by the HPO, implements the CRM Program for archaeological resources, and coordinates with external regulatory agencies that regulate environmental and cultural resource programs in regard to Tribal properties and resources, and to archaeological resources (e.g., sites, artifacts, features, or other archaeological indications of past human activities).
- Archaeological deposits that are newly discovered during any undertaking will be evaluated for their NRHP eligibility.
- Until NASA has determined an archaeological site is ineligible, all known sites will be treated as eligible and will be avoided insofar as possible.
- In the event that an archaeological deposit is inadvertently discovered, work must cease, the HPO must be notified, and a professional archaeologist must be consulted. Prehistoric archaeological material may include flaked stone tools (projectile point, biface, scraper, etc.), debitage (flakes), groundstone milling tools and fragments (mortar, pestle, handstone, millstone, etc.), faunal bones, fire-affected rock, and midden deposits. Historic archaeological material may include cut nails and other metal hardware, glass fragments, ceramic or stoneware fragments, milled or split lumber, structural remains, and trash dumps.



- If the professional archaeologist and NASA recommend that the archaeological deposit is eligible, the HPO will consult with SHPO and federally recognized Tribes on the need for further testing and/or data recovery.
- If the planned undertaking(s) may affect properties having historic value to any federally recognized Tribes with which NASA consults, the HPO will consult with the federally recognized Tribes and give them an opportunity to participate as interested persons during the consultation process.
- In the event that human remains are inadvertently discovered, work must cease in the area of the discovery and the HPO and EMD must be notified. If remains are determined to be human, federally recognized Tribes will be notified and SOP No. 9, Treatment of Human Remains and Funerary/Sacred Objects, will be followed.

### ***Procedure***

- I. Workers will notify the EMD immediately upon the discovery of possible archaeological deposits. (Standard language will be placed in contracts requiring contractors to notify the HPO/EMD immediately upon discovery of possible archaeological deposits.)
- II. When notified of the possible discovery of unexpected buried archaeological material, the EMD will arrange to have a professional archaeologist evaluate the site. Work will cease and the site will be protected pending the results of the evaluation.
  - A. If fossils, natural stones, concretions, or other such items that are sometimes mistaken for archaeological materials are recovered, then the EMD may allow the excavation to proceed without further action.
  - B. If disturbances to the deposit have been slight and the project can be relocated to avoid the buried site, the EMD will determine if recordation with DPR 523 forms is warranted. If warranted, the DPR forms will be submitted to SHPO, in a routine manner, having avoided further adverse impact through relocation of the proposed undertaking.
  - C. If the location of the project cannot be changed, the EMD will contact SHPO by telephone or email, to report the discovery and initiate emergency consultation.
    1. If the deposits are evaluated as ineligible for inclusion in the NRHP by a professional archaeologist, the EMD will have the site recorded and DPR 523 Inventory forms submitted to SHPO for concurrence. Upon concurrence by SHPO that the deposits are ineligible for the NRHP, NASA may allow the excavations to proceed and will advise the excavation foreperson(s) of the possibility and nature of additional discoveries that would require immediate notification of the EMD.
    2. If, in the opinion of the professional archaeologist, the existing information is deemed insufficient to make a determination of eligibility, then an emergency-testing plan will be developed by NASA in coordination with SHPO and federally recognized Tribes. Further excavation in the vicinity of the site will be suspended



until an agreed upon testing procedure has been carried out and sufficient data have been gathered to allow a determination of eligibility.

- a) If SHPO and the EMD agree after testing that the site is ineligible for listing in the NRHP, then work on the project may resume.
- b) If the site appears eligible for listing in the NRHP, or if NASA and SHPO cannot agree on the question of eligibility, then NASA will implement the following alternative actions, depending on the urgency of the action being delayed by the discovery of cultural material.

3. NASA may relocate the project to avoid adverse effect.

4. NASA may proceed with a data recovery plan under an MOA with ACHP, SHPO, and federally recognized Tribes. The MOA will specify the scope and level of effort of data recovery required to mitigate the adverse impact of the project on the site in question.

5. NASA may request comments from ACHP and may develop and implement actions that take into account the effects of the undertaking and the comments of SHPO, federally recognized Tribes, and ACHP. Interim comments must be provided to NASA (as soon as possible) and formal comments within 30 days.

III. If examination by a professional osteologist indicates the materials are of human origin, an archaeologist must make a field evaluation of the primary context of the deposit and its probable age and significance, record the findings in writing, and document the materials.

- A. If at any time human remains, funerary objects, or Native American sacred objects are discovered, the EMD will ensure that the provisions of NAGPRA and/or AIRFA are implemented.
- B. The EMD will begin consultation with federally recognized Tribes in accordance with NAGPRA.